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FILED VIA ECF

July 19, 2024

Honorable Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1105
New York, NY 10007

Re: *Carrodine et al. v. Flatiron Media, LLC et al.*, No. 1:22-cv-09660-JMF

Dear Judge Furman:

We represent Unlimited Traffic Limited, Sea Ranch International Limited, and Sea Ranch International Pte. Ltd. (collectively, "HasTraffic") in the above-captioned matter. We write to respectfully request HasTraffic's time to file a responsive pleading be extended through August 13, 2024.

Per Your Honor's Individual Rule 2(E), we address the following six factors:

(1) Original dates

The second amended class-action complaint was filed on February 6, 2024 (Dkt. 81) and Plaintiffs attempted service on the three HasTraffic companies during the first half of May. Two of the companies—Unlimited Traffic Limited and Sea Ranch International Limited—are in Hong Kong and the third—Sea Ranch International Pte. Ltd.—is in Singapore. The parties agree that the Hong Kong companies were properly served on or about May 8, 2024, making their original responsive-pleading deadline June 3. Plaintiffs contend that the Singaporean company was served on or about May 14, 2024. HasTraffic disputes that service was proper under the Hague Convention. If service was proper, then the Singaporean entity's original responsive-pleading deadline would be June 7, 2024. On May 28, 2024, the Court issued an Order (Dkt. 104) extending HasTraffic's time to file a responsive pleading through July 23, 2024.

(2)-(3) The number of previous requests and the outcome of same

On May 28, 2024, HasTraffic submitted a request for an extension to file a responsive pleading through July 23, 2024 (Dkt. 104). The Court issued an Order granting the request on May 29, 2024 (Dkt. 105).

Honorable Jesse M. Furman

July 19, 2024

Page 2 of 3

(4) Reasons for the requested extension

We have actively been exploring the factual and legal bases of this suit and believe that early resolution may be possible. This extension should provide enough time to make a final determination of whether further litigation is necessary. After discussing the same with plaintiffs' counsel, they agreed to this extension, provided this Court approves it.

(5) Whether the adversary consents

Plaintiffs' counsel Christopher E. Roberts consented to this extension on behalf of Plaintiffs on July 18, 2024.

(6) Date of next scheduled appearance and other deadlines

The parties are next scheduled to appear before the Court on December 4, 2024 for a pretrial conference.

On May 10, 2024 (Dkt. 102) the Court entered the following deadlines in this case:

Item	Deadline
Mediation	In or around October 2024
Discovery end date	November 25, 2024
Pre-trial conference	December 4, 2024
Class-certification deadline	December 16, 2024
Trial	TBD

Conclusion

Based on the above, HasTraffic believes there is good cause for the requested extension. If Your Honor has any questions or requires additional information we would be pleased to provide it forthwith.

Honorable Jesse M. Furman

July 19, 2024

Page 3 of 3

Respectfully submitted,

/s/ Derek A. Newman

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Cc: All Counsel of Record (via ECF)